

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

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IN RE: C.R. BARD, INC., PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY LITIGATION

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MDL NO. 2187

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IN RE: AMERICAN MEDICAL SYSTEMS, INC.  
PELVIC REPAIR SYSTEMS PRODUCTS  
LIABILITY LITIGATION

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MDL No. 2325

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IN RE: BOSTON SCIENTIFIC CORP., PELVIC  
REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

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MDL No. 2326

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IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

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MDL No. 2327

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IN RE: COLOPLAST CORP., PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY LITIGATION

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MDL No. 2387

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IN RE: COOK MEDICAL, INC, PELVIC REPAIR  
SYSTEM PRODUCTS LIABILITY LITIGATION

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MDL No. 2440

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IN RE NEOMEDIC PELVIC REPAIR SYSTEM  
PRODUCT LIABILITY LITIGATION

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MDL No. 2511

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*This Document Relates To All Cases*

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**MOTION TO EXCEED PAGE LIMIT FOR COMMON BENEFIT FEE AND COST  
COMMITTEE’S REPLY IN SUPPORT OF PETITION FOR AN AWARD OF  
COMMON BENEFIT ATTORNEYS’ FEES AND EXPENSES  
AND MEMORANDUM IN SUPPORT**

The undersigned members of the Common Benefit Fee and Cost Committee (“FCC”), move the Court pursuant to Local Rule 7.1(a)(2) for leave to exceed the page limit specified under said Rule for their Reply in Support of Petition for an Award of Common Benefit Attorneys’ Fees and Expenses and Memorandum in Support, and show as follows:

The FCC acknowledges the admonition of the Court’s Local Rule 7.1(a)(2) that motions to exceed page limitations are disfavored and will be denied without a showing of good cause. Plaintiffs respectfully submit that good cause exists here in light of the import of the scope and import of the issues for all related MDLs. The FCC’s Petition for an Award of Common Benefit Attorneys’ Fees and Expenses and Memorandum in Support sets forth the factual and legal basis for compensation for the common benefit work performed from the outset of this litigation. A Response in Opposition has been filed to the FCC’s Petition which asserts a number of arguments, which the FCC is compelled to refute.

Based on the foregoing, and for good cause shown, the FCC respectfully moves the Court for leave to exceed the Court’s page limitation to file its Reply in Support of Petition for an Award of Common Benefit Attorneys’ Fees and Expenses and Memorandum in Support not to exceed thirty (30) pages.

Dated: November 30, 2018

Respectfully submitted,

THE COMMON BENEFIT FEE AND COST COMMITTEE

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2018, a true and correct copy of the foregoing Motion to Exceed Page Limit for Common Benefit Fee and Cost Committee's Reply in Support of Petition for an Award of Common Benefit Attorneys' Fees and Expenses and Memorandum in Support was served via electronic mail with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF counsel of record.

/s/ Henry G. Garrard, III

Henry G. Garrard, III

Chairman

The Common Benefit Fee and Cost Committee